

**REMARKS**

Prior to entry of this amendment, claims 1-19 are pending. By this amendment, claims 1, 5, 6, 11, 12, and 14-19 are amended. Also by this amendment, the title of the specification is amended. No new matter is added.

Claims 1-19 are presented for prosecution.

Favorable reconsideration of this application is respectfully requested in view of the foregoing amendments and following remarks.

**Request for Information Under 37 C.F.R. § 1.105**

A request for information under 37 CFR § 1.105 was included in the Office Action mailed October 20, 2004. In response to the request, Applicant submits the attached form PTO-1449, listing two references used in drafting the subject application. If any further information is needed, the Examiner is encouraged to contact Applicant's undersigned representative at the telephone number listed below.

**Objection to the Drawings**

In the Office Action mailed October 20, 2004, Figs. 1A-1C and 8-12 were objected to for allegedly showing only that which is old and failing to include a legend such as "Prior Art". Applicant respectfully traverses the objection, as follows.

Figs. 1A-1C and 8-12 show embodiments of the claimed invention. The "Brief Description of the Drawings" section of the Application as filed discloses that Figs. 1A and 8-12 show MOS-type solid-state image pickup devices according to a plurality of embodiments of the claimed invention, and that Fig. 1C shows an example of a portion of the MOS-type solid-state image pickup device 100 shown in FIG. 1A. Also, Fig. 1B illustrates a pixel 10, which is representative of "each pixel 10" of the MOS-type solid-

state image pickup device 100 of Fig. 1A. See the specification at p. 13, line 21 – p. 19, line 1.

Since Figs. 1A-1C and 8-12 show a plurality of embodiments of the claimed invention, and do not show that which is old, it is respectfully submitted that no legend such as “Prior Art” is required. It is respectfully submitted that Figs. 1A-1C and 8-12 are in compliance with US patent practice, and withdrawal of the objection is respectfully requested.

#### **Objection to the Specification**

In the outstanding Office Action, the title of the description was objected to for allegedly failing to be clearly indicative of the invention to which the claims are directed. The title has been amended responsive to this objection. If any additional amendment is necessary to overcome this objection, the Examiner is requested to contact the Applicant's undersigned representative.

#### **Claims 1-13 Recite Patentable Subject Matter**

In the outstanding Office Action, claims 1-13 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,452,004 to Roberts (hereinafter, “Roberts”). It is noted that claims 1, 5, 6, 11, and 12 have been amended. To the extent that the rejection remains applicable to the claims currently pending, Applicant hereby traverses the rejection, as follows.

Claim 1 recites, in part:

an overall reset controller positioned within a column-directional shifter for supplying the reset signal to said reset signal lines at one time.

It is respectfully submitted that Roberts neither discloses nor suggests an overall reset controller positioned within a column-directional shifter for supplying the reset signal to said reset signal lines at one time.

The Office Action asserts that Roberts discloses the overall reset controller as recited in claim 1 at col. 13, lines 30-34, and in Fig. 1, element 208. Applicant respectfully submits that the control cache 208 of Roberts "performs a buffer memory function so that pixel addresses, commands for window defining, commands for time integrations, commands for pixel resetting and gain variation on the pixels, as well as for taking a 'snap shot' at a particular window on the array 12," as disclosed at col. 13, lines 30-34. Roberts neither discloses nor suggests an overall reset controller positioned within a column-directional shifter. Furthermore, Roberts neither discloses nor suggests that the overall reset controller supplies a reset signal to reset signal lines at one time, as recited in claim 1.

To qualify as prior art under 35 U.S.C. §102, a single reference must teach, i.e., identically describe, each feature of a rejected claim. As explained above, Roberts does not disclose or suggest each and every feature of independent claim 1. Therefore, Applicant respectfully submits that Roberts does not anticipate or render obvious independent claim 1.

For at least the reasons set forth above, Applicant respectfully submits that independent claim 1 is patentably distinct over Roberts and in condition for allowance.

Claims 2-13 depend from claim 1. Therefore, Applicant respectfully submits that claims 2-13 are allowable for the same reasons as claim 1, as well as for the additional subject matter recited therein.

**Claims 14-19 Recite Patentable Subject Matter**

Claims 14-16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Roberts in view of U.S. Patent No. 4,827,348 to Ernest, et al. (hereinafter, "Ernest") and claims 17-19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Roberts in view of Ernest and further in view of U.S. Patent No. 5,382,974 to Soeda, et al. (hereinafter, "Soeda"). It is noted that claims 14-19 have been amended. To the extent that the rejections remain applicable to the claims currently pending, Applicant hereby traverses the rejections, as follows.

Claim 14 recites a digital camera having, among other features, a MOS-type solid-state image pickup device. The MOS-type solid-state image pickup device of the digital camera of claim 14 includes an overall reset controller positioned within a column-directional shifter for supplying the reset signal to reset signal lines at one time. The digital camera of claim 14 further includes a light shielding device for interrupting light incident to the MOS-type solid-state image pickup device. In addition, the digital camera of claim 14 includes a first still picture mode controller for conducting an image signal readout operation in which the light shielding device is operated and interrupts the incident light for a predetermined period of time after the overall reset operation is finished.

It is respectfully submitted that none of the applied art of record discloses or suggests a MOS-type solid-state image pickup device including an overall reset controller positioned within a column-directional shifter for supplying a reset signal to reset signal lines at one time, or a first still picture mode controller for conducting an image signal readout operation in which the light shielding device is operated and

interrupts the incident light for a predetermined period of time after the overall reset operation is finished, as recited in claim 14.

As described above, Roberts neither discloses nor suggests an overall reset controller positioned within a column-directional shifter for supplying a reset signal to reset signal lines at one time, as recited in claim 14.

Applicant further submits that Ernest and Soeda, taken alone or in combination, also fail to disclose or suggest an overall reset controller positioned within a column-directional shifter for supplying a reset signal to reset signal lines at one time.

Ernest and Soeda are both directed to CCD imaging devices and neither reference discloses an overall reset controller, a column-directional shifter or reset signal lines.

Therefore, the combination of Roberts, Ernest and Soeda cannot and does not disclose a first still picture mode controller for conducting an image signal readout operation in which the light shielding device is operated and interrupts the incident light for a predetermined period of time after the overall reset operation is finished, as recited in claim 14.

To establish *prima facie* obviousness of a rejected claim, the applied art of record must teach or suggest each feature of a rejected claim. See *M.P.E.P.* §2143.03. As explained above, none of Roberts, Ernest and Soeda, alone or combined, discloses or suggests each and every feature of independent claim 14. Therefore, Applicant respectfully submits that Roberts, Ernest and Soeda, alone or in combination, neither anticipate nor render obvious the invention recited in claim 14.

For at least the reasons set forth above, Applicant respectfully submits that independent claim 14 is patentably distinct over Roberts, Ernest and Soeda and in condition for allowance.

Claims 15-19 depend from claim 14. Therefore, Applicant respectfully submits that claims 15-19 are allowable for the same reasons as claim 14, as well as for the additional subject matter recited therein.

### **Conclusion**

For all of the above reasons, it is respectfully submitted that claims 1-19 are in condition for allowance and a Notice of Allowability is earnestly solicited.

Should the Examiner determine that any further action is necessary to place this application into better form, the Examiner is invited to contact the undersigned representative at the telephone number listed below.

In the event this paper is not considered to be timely filed, the Applicants hereby petition for an appropriate extension of time. The Commissioner is hereby authorized to charge any fee deficiency or credit any overpayment associated with this communication to Deposit Account No. 01-2300 referencing client matter number 107317-00026.

Respectfully submitted,  
Arent Fox, PLLC



Michele L. Connell  
Registration No. 52,763

**Customer No. 004372**  
1050 Connecticut Ave., N.W.  
Suite 400  
Washington, D.C. 20036-5339  
Telephone No. (202) 857-6104  
Facsimile No. (202) 857-6395  
MLC:sg

Attachment: FORM PTO-1449